UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
vs.)) NO. 04-30004-MAP
ROOSEVELT ARCHIE)

MOTION FOR RETURN OF BAIL

Now comes the defendant in the above entitled matter and respectfully requests this Honorable Court for an order directing the return of bail previously posted for his release. The defendant has plead guilty and is detained pending sentencing.

Counsel for the defendant has conferred with counsel for the government and has expressed no objection to allowance of the motion.

Wherefore defendant requests that his bail be returned to the surety who posted it.

DEFENDANT

Vincent A. Bongiorni, Bsq. 95 State Street - Suite #309 Springfield, MA 01103

(413) 732-0222 BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing to Assistant United States Attorney, Paul Smyth, 1550 Main Street, Springfield, MA 01103, this 15 day of September 2005.